

AGF&J

Abrams, Gorelick, Friedman & Jacobson, LLP
Attorneys At Law

One Battery Park Plaza
4th Floor
New York, NY 10004

Phone: 212-422-1200
Fax: 212-968-7573
www.agflaw.com

September 4, 2024

Via ECF Transmission

The Hon. Magistrate Judge Vera M. Scanlon
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Zai Ji Tian v. Wayne Audibert and NFI Interactive Logistics
EDNY Docket No.: 18-CV-7119
Our File No.: 31946

Dear Honorable Madam:

As you are aware, I and my firm represent the defendants in this matter. I write in response to the letter filed by Yosef H. Lee of the Law Offices of Gary S. Park, P. C. purportedly providing an excuse for counsels' failure to appear as directed by the Court in its order of August 24, 2024.

Mr. Lee's letter is shameful and does not give a reasonable explanation of his and Mr. Park's failure to appear.

First and foremost, the claim that neither he nor Mr. Park "were unaware of the conference" is untrue on its face. Both Mr. Lee and Mr. Park are listed in the court record as attorneys of record for plaintiff. It is beyond belief that neither received the electronic notice of the issuance of the court order directing them to appear.

Second, I cannot believe that plaintiff's trial counsel, Mr. Forde, did not contact the Park firm and advise them that you had directed their appearance in the telephone conference conducted that day.

It is clear that, despite the Court's interest in engaging in substantive discussions with the attorneys of record, the Park firm ignored the Court's Order that an attorney with knowledge of the file appear, thereby frustrating an important reason for the conference.

Respectfully submitted,

ABRAMS, GORELICK, FRIEDMAN
& JACOBSON, LLP

By: Glenn A. Jacobson
Glenn A. Jacobson (7170)

GAJ/am